

JESSE GOODMAN #689  
STU-ANNEX  
8 PRODUCTION WAY  
P.O. BOX 905  
AVENEL, NJ 07001

CLERK  
U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
RECEIVED

2017 APR -1 P 3:09

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UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF NEW JERSEY

JESSE GOODMAN  
PLAINTIFF:

C.A. NO. \_\_\_\_\_

VS.

GARY LANIGAN, COMMISSIONER  
SHERRY YATES, ADMINISTRATOR  
RYAN O'DAY, ASST. ADMINISTRATOR  
JOHN DOE #1, S.O.G. SUPERVISOR  
JOHN DOE #2, S.O.G. OFFICER  
JOHN DOE #3, S.O.G. OFFICER

DEFENDANTS:

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INTRODUCTION

1. THIS IS A TITLE 42, 1983 CIVIL RIGHTS COMPLAINT ADDRESSING CONDUCT OF S.O.G. OFFICERS ON JANUARY FOURTH, TWENTY SEVENTEEN, BEGINNING AT 3:30am.

I WAS CALLED NAMES, THREATENED, VERBALLY DEMEANED BY A NUMBER OF OFFICERS, PHYSICALLY ASSAULTED, ILLEGALLY STRIP-SEARCHED, AND FORCED TO STAND IN LINE SO TIGHT AND WITHOUT PROPER SPACE IN BETWEEN PERSONS THAT IT WAS EMBARRASSING. AS A RESULT OF THESE ACTIONS, I'VE HAD TROUBLE SLEEPING, I'VE EXPERIENCED FLASHBACKS TO MY INSTANT RECOVERY FROM A DOCUMENTED TRAUMATIC BRAIN INJURY I SUSTAINED - WHERE I HAD MUCH DIFFICULTY PROCESSING AND FOLLOWING INSTRUCTIONS - HEADACHES, AND NERVOUS REACTIONS DUE TO SUDDEN LOUD VOICES OF MULTIPLE OFFICERS WHEN THEY COME INTO MY DORM WHERE I AM HOUSED. BECAUSE OF THE EVENTS OF JANUARY FOURTH, TWENTY SEVENTEEN, I AM IN FEAR OF S.O.G. RETURNING ON A NIGHTLY BASIS.

AS A RESULT OF THESE ACTIONS, I ASSERT THIS CLAIM AGAINST THE LISTED DEFENDANTS FOR DEPRIVING ME OF MY FOURTH AND FOURTEENTH AMENDMENT RIGHTS OF THE UNITED STATES CONSTITUTION AND MY STATE STATUTORY RIGHTS UNDER THE FEDERAL AND NEW JERSEY STATE CONSTITUTION FOR CREATING A HOSTILE RESTRICTIVE ENVIRONMENT, USE OF EXCESSIVE FORCE, ASSAULT AND BATTERY, AND AN ILLEGAL STRIP SEARCH WITHOUT PROBABLE CAUSE.

### PLAINTIFF REQUESTS JURY TRIAL

2. I, JESSE GOODMAN, AM THE PLAINTIFF IN THIS COMPLAINT. I AM PRESENTLY BEING CONFINED AT THE SPECIAL TREATMENT UNIT - ANNEX UNDER NEW JERSEY'S SEXUALLY VIOLENT PREDATOR ACT. MY CONFINEMENT IS CIVIL AND NOT CRIMINAL BECAUSE I AM BEING TREATED FOR PURPOSES OF TREATMENT AS A RISK TO COMMIT A CRIME, AND NOT PUNISHMENT FOR HAVING COMMITTED A CRIME.

### 3. DEFENDANTS:

**GARY LANIGAN, COMMISSIONER,** RESPONSIBLE FOR THE TOTALITY OF THE DAILY OPERATIONS OF THE NEW JERSEY DEPARTMENT OF CORRECTIONS, TRAINING OF OFFICERS, PROMULGATION OF THE RULES AND REGULATIONS FOR THE NEW JERSEY DEPARTMENT OF CORRECTIONS. MR LANIGAN IS BEING SUED IN HIS INDIVIDUAL CAPACITY.

**SHERRY YATES, ADMINISTRATOR,** IS THE ADMINISTRATOR FOR THE ADULT DIAGNOSTIC & TREATMENT CENTER AND THE SPECIAL TREATMENT UNIT IN AVENEL, NEW JERSEY. AS SUCH, MS. YATES IS RESPONSIBLE FOR OVERSEEING OPERATIONS AT THE S.T.U., RESPONSIBLE FOR TRAINING OFFICERS AT THE S.T.U., AND RESPONSIBLE FOR PROMULGATING THE RULES AND REGULATIONS AT THE S.T.U., AND OVERSEEING THE SAFETY AND SPECIAL NEEDS OF THE RESIDENTS OF THE S.T.U. MS. YATES IS BEING SUED IN HER INDIVIDUAL CAPACITY.

**RYAN O'DAY, ASST. ADMINISTRATOR:** RESPONSIBLE FOR OVERSEEING THAT OFFICERS AT THE S.T.U. ARE TRAINED TO DEAL WITH THE SPECIAL NEEDS AND SAFETY OF RESIDENTS AT THE S.T.U., PROMULGATING THE RULES AND REGULATIONS, AND OVERSEEING THE DAILY OPERATIONS OF THE S.T.U. MR. O'DAY IS BEING SUED IN HIS

INDIVIDUAL CAPACITY.

**JOHN DOE #1: S.O.G. SUPERVISOR:** S.O.G. IS THE SPECIAL OPERATIONS GROUP WITHIN THE NEW JERSEY DEPARTMENT OF CORRECTIONS AND IS THE "**SPECIAL RESPONSE UNIT**" FOR THAT DEPARTMENT. S.O.G. IS RESPONSIBLE FOR RESPONDING TO CRISES WITHIN THE PRISON SYSTEM. THE S.O.G. SUPERVISOR IS RESPONSIBLE FOR THE DAILY OPERATIONS OF THE SPECIAL OPERATIONS GROUP, PROMULGATION OF THE RULES AND REGULATIONS FOR S.O.G., AND IS RESPONSIBLE FOR THE TRAINING OF S.O.G. OFFICERS. JOHN DOE #1 IS BEING SUED IN HIS INDIVIDUAL CAPACITY.

**JOHN DOE #2** IS THE OFFICER WHO PHYSICALLY ASSAULTED ME: ME BEING WOKEN UP OUT OF A SOUND SLEEP TO THE SUDDEN YELLING AND SCREAMING OF NUMEROUS S.O.G. OFFICERS (AS I WAS TO FIND OUT), I LIFTED MY HEAD UP OFF OF MY PILLOW TO SEE WHAT WAS GOING ON, AS THE LIGHTS WERE ON. AS SOON AS I DID, MY HEAD WAS FORCEFULLY PUSHED BACK DOWN INTO MY BUNK BED BY THIS PARTICULAR OFFICER AS HE SCREAMED DIRECTIONS TO ME. WITH MY HEAD NOW PUSHED DOWN INTO THE BUNK BED, HE CONTINUED TO PHYSICALLY PRESS ME DOWN WHILE CONTINUALLY SCREAMING AT AND THREATENING ME. HE THEN AGGRESSIVELY YANKED BOTH OF MY ARMS BEHIND MY BACK AND FORCED MY HANDS OVER MY HEAD, YELLING AT ME TO HOLD THEM THERE IN THIS PAINFUL, STRESSFUL MANNER FOR WHAT TURNED OUT TO BE A LONG PERIOD OF TIME. AFTER THIS PERIOD, THE OFFICER THEN RETURNED TO MY AREA, YELLING AT ME TO GET OUT OF MY BUNK AND LINE UP DIRECTLY BEHIND OTHER S.T.U. RESIDENTS OF MY DORM FOR WHAT WAS TO BECOME THE ILLEGAL STRIP SEARCH. FOLLOWING THE STRIP SEARCH, THIS OFFICER WAS DIRECTLY RESPONSIBLE FOR HOLDING ME HOSTAGE IN ANOTHER BUILDING ON THE S.T.U. COMPOUND FOR HOURS, DEPRIVING ME OF A GOOD NIGHT'S SLEEP AND A HEALTHY BREAKFAST, AFTER HOURS OF DISPLACEMENT FROM MY APPOINTED AREA FOR NO REASON. JOHN DOE #2 IS BEING SUED IN HIS INDIVIDUAL CAPACITY.

**JOHN DOE #3** IS THE OFFICER WHO ILLEGALLY, AND WITHOUT PROBABLE CAUSE, COMPELLED ME TO STRIP, TOUCH, AND EXPOSE MYSELF BEFORE HIM AND NUMEROUS OTHER S.T.U. REISDENTS BY WAY OF DIRECT ORDERS, VERBAL THREATS AND DEMEANING COMMENTS, AS WELL AS UNDER THE THREAT OF PHYSICAL VIOLENCE. JOHN DOE #3

IS BEING SUED IN HIS INDIVIDUAL CAPACITY.

4. NAME OF STATE AGENCY THEY WORK FOR. STATE YOU ARE SUING THEM IN. SOME INDIVIDUALS OR OFFICERS. THE STATE OF NEW JERSEY DEPARTMENT OF CORRECTIONS, THE STATE OF NEW JERSEY, EMPLOYEES OF SAID DEPARTMENT OF CORRECTIONS.

#### STATEMENT OF FACTS

S.O.G. AS A GROUP CAME INTO THE S.T.U. AT 3:30am WITH MALICE AND FORETHOUGHT TO DO BODILY HARM, AND WILLFUL INTENT TO DISRUPT AND CHASTISE THE RESIDENTS OF THE S.T.U. THEY SCREAMED AT ME, VERBALLY THREATENED ME, PLACED HANDS FORCEFULLY ON MY PERSON, MADE ME ILLEGALLY STRIP-SEARCH IN FRONT OF THEM AND OTHERS, AND CAUSED ME TO HAVE ONGOING FLASHBACKS TO MY INSTANT RECOVERY FROM A WELL-DOCUMENTED TRAUMATIC BRAIN INJURY I SUSTAINED IN A CAR ACCIDENT BACK IN 1997 - WHERE I INITIALLY HAD EXTREME DIFFICULTY PROCESSING AND FOLLOWING INSTRUCTIONS BEING GIVEN TO ME IN A POLITE AND KIND MANNER. BEING ABRUPTLY WOKEN UP BY S.O.G BACK ON JANUARY FOURTH, TWENTY SEVENTEEN, TO NUMEROUS SCREAMING VOICES, AS WELL AS THE OFFICER WHO PHYSICALLY ASSAULTED ME, I WAS CONFUSED AND SCARED, NOT UNDERSTANDING WHAT WAS GOING ON. FORTUNATELY FOR ME, IT DID NOT RESULT IN ANY FURTHER BODILY HARM TO ME, BUT I SUFFERED MENTALLY AND EMOTIONALLY FROM THIS EVENT, BRINGING ME BACK THAT OTHER TIME OF GREAT MENTAL AND EMOTIONAL SUFFERING. I HAVE SINCE HAD DIFFICULTY SLEEPING, RECURRING HEADACHES, AS WELL AS DIFFICULTY CONCENTRATING IN MY VARIOUS THERAPY GROUPS IN ORDER TO MAINTAIN MY RECOVERY. AS I SAID, THIS EVENT OCCURRED ON 1/4/17. I AM IN DAILY FEAR THAT IT WILL HAPPEN AGAIN.

#### RELIEF

STATE BRIEFLY AND EXACTLY WHAT YOU WOULD LIKE THE COURTS TO DO FOR YOU.

AS A CIVILIAN, UNDER THE NEW JERSEY S.V.P.A. AND NOT CRIMINAL, S.O.G. IS PROHIBITED FROM ENGAGING IN PRISON-TYPE RIOT TACTICS UNDER THE GUISE OF A SEARCH, VERBAL AND PHYSICAL ABUSE. THESE PRACTICES SHOULD CEASE AND DESIST IMMEDIATELY DUE TO THEIR ADVERSE EFFECTS ON TREATMENT AND THE RESIDENTS' PROGRESS. IN COMPENSATION FOR THE PHYSICAL, MENTAL, AND EMOTIONAL TRAUMA I SUSTAINED FROM THIS

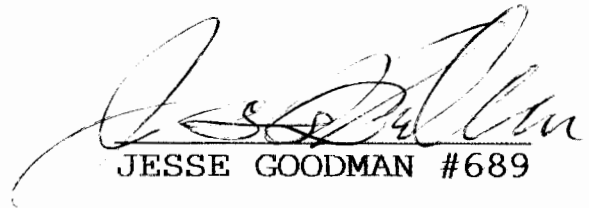


EVENT, I SEEK \$500,000.

I DECLARE AND STATE UNDER THE PENALTY OF PERJURY,  
THAT THE FOREGOING IS TRUE AND CORRECT.

DATED

2/15/17

A handwritten signature in black ink, appearing to read "Jesse Goodman", written over a horizontal line.

JESSE GOODMAN #689

**FROM:** JESSE GOODMAN #689  
P.O. BOX 905  
AVENEL, NJ 07001  
S.B.I.# 135872D  
STU-ANNEX B-DORM

**TO:** OFFICE OF THE ATTORNEY GENERAL  
DEPARTMENT OF LAW & PUBLIC SAFETY  
HUGHES JUSTICE COMPLEX  
25 MARKET ST.  
TRENTON, NJ 08625

### NOTICE OF CLAIM

1. PERSON(S) CITY OR STATE EMPLOYEES YOU ARE FILING AGAINST:

MR. GARY LANIGAN, COMMISSIONER, NEW JERSEY DEPARTMENT OF CORRECTIONS; MS. SHERRY YATES, ADMINISTRATOR, SPECIAL TREATMENT UNIT AND ADULT DIAGNOSTIC & TREATMENT CENTER; MR. RYAN O'DAY, ASSISTANT ADMINISTRATOR, SPECIAL TREATMENT UNIT AND ADULT DIAGNOSTIC & TREATMENT CENTER; MR. FOLEY, MAJOR, SPECIAL OPERATIONS, ALL PERSONS PRESENT DURING INCIDENT EMPLOYED BY DEPARTMENT OF CORRECTIONS.

2. STATE THE DATE AND THE SITUATION THAT TOOK PLACE: ON JAN. 4, 2017, AT APPROXIMATELY 3:30am, THE SPECIAL OPERATIONS GROUP (S.O.G.) STORMED ONTO THE DORM IN WHICH I AM HOUSED AT THE S.T.U. ANNEX SCREAMING FOR THE RESIDENTS TO: "GET ON YOUR STOMACHS, FACES DOWN TOWARDS THE WALL, HANDS BEHIND YOUR HEADS!" THEY WERE CURSING, HARASSING, VERBALLY THREATENING US WITH PHYSICAL VIOLENCE, AND GENERALLY USING ABUSIVE LANGUAGE IN VERY HARSH TONES. I WAS ABRASIVELY AWOKEN OUT OF A SOUND SLEEP TO HEARING ALL OF THIS, ONE OFFICER RIGHT AWAY SCREAMING INTO MY EAR ALL OF THE AFOREMENTIONED DEMANDS AND PHYSICALLY, FORCEFULLY PUSHING MY HEAD DOWN INTO THE BUNK, CONTINUING TO PRESS ME DOWN AND THEN AGGRESSIVELY YANKING BOTH OF MY ARMS BEHIND MY BACK, ULTIMATELY PLACING MY HANDS ON TOP OF AND BEHIND MY HEAD, TOLD NOT TO MOVE AND LEAVING ME IN THIS MANNER FOR SOME TIME. HAVING JUST BEEN FAST ASLEEP, I WAS INSTANTLY CONFUSED AND

VERY SCARED. I WAS HAVING FLASHBACKS TO THE TIME OF MY INSTANT RECOVERY FROM A WELL-DOCUMENTED TRAUMATIC BRAIN INJURY THAT I SUFFERED IN A CAR ACCIDENT BACK IN 1997, WHERE I HAD GREAT DIFFICULTY PROCESSING AND FOLLOWING INSTRUCTIONS WHEN GIVEN TO ME, JUST THEN IN A VERY KIND AND GENTLE MANNER. THE HEAVY MENTAL AND EMOTIONAL SUFFERING THIS RECENT S.O.G. EVENT TOOK ON ME INSTANTLY BROUGHT ME BACK TO THIS OTHER TIME OF GREAT MENTAL AND EMOTIONAL SUFFERING I ENDURED, EVEN WITHOUT THE HARSHNESS OR THREATS. AFTER QUITE AWHILE HAVING TO REMAIN IN THIS PAINFUL AND STRESSFUL POSITION THE S.O.G. OFFICERS WERE INSISTING, I WAS LINED UP AND TAKEN TO THIS BUILDING'S DINING AREA, WHERE I WAS MADE TO ENDURE A VERY HUMILIATING STRIP SEARCH IN FRONT OF OFFICERS AND NUMEROUS OTHER RESIDENTS. FINALLY, I WAS MADE TO LEAVE THIS BUILDING AND MARCHED TO ANOTHER BUILDING ON THE STU COMPOUND, WHERE I HAD TO REMAIN FOR HOURS, AGAINST MY WILL. I, ALONG WITH ALL OF MY DORM'S OTHER RESIDENTS, WERE EVENTUALLY ALLOWED TO RETURN TO THE ANNEX JUST AFTER 9am.

**3. WHAT INJURIES DID YOU SUFFER, LOST PROPERTY, PHYSICAL OR EMOTIONAL INJURIES: STATE STATUTES VIOLATED: NJAC 10:35 2.3 (1).**

**I WAS EXHAUSTED, TERRIFIED, HUMILIATED, PHYSICALLY HURT A THE ONSET OF THE EVENT, ANGRY, EXASPERATED, MY BACK HURT, AND I HAD A HEADACHE.**

**4. NAME THE PUBLIC AGENCY, CITY/STATE, OR EMPLOYEES THAT CAUSED YOUR INJURIES, DAMAGES, OR LOSSES:**

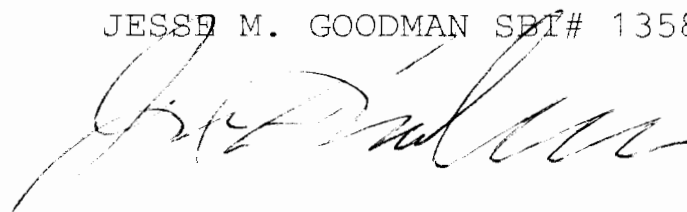
**LISTED HEREIN**

**STATE AMOUNT OF DAMAGE IN MONETARY VALUE:**

**\$500,000.00**

DATE: 2/15/17

JESSE M. GOODMAN SBI# 135872D

A handwritten signature in dark ink, appearing to read 'Jesse M. Goodman', is written over the typed name and ID number.

Jesse Goodman #689  
STU-Annex  
600 Box 905  
Avenel, NJ 07001

U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
RECEIVED

APR -1 P 3:09

STU

CLERK OF THE COURT:  
UNITED STATES DISTRICT COURT  
FOR NEW JERSEY  
MARTIN LUTHER KING JR. BUILDING  
50 WALNUT ST.  
NEWARK, NJ 07102

7002 2410 0006 9080 0496



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